

# EXHIBIT UBER-58

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

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WAYMO LLC, )  
 )  
Plaintiff, )  
 )  
vs. ) No. 3:17-cv-00939-WHA  
 )  
UBER TECHNOLOGIES, INC., )  
OTTOMOTTO LLC; OTTO )  
TRUCKING LLC, )  
 )  
Defendants. )  
----- )

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

VIDEOTAPED DEPOSITION OF MARY FULGINITI GENOW  
Los Angeles, California  
Tuesday, October 17, 2017  
Volume I

Reported by:  
LORI M. BARKLEY  
CSR No. 6426  
Job No. 2728159

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1 Q. Okay. But you -- 14:08:20

2 A. This -- 14:08:22

3 Q. -- you're confident that Exhibit 7111 is the 14:08:22

4 most recent and up-to-date interview memorandum? 14:08:25

5 A. Yes. 14:08:27

6 Q. And how was this interview memorandum 14:08:31

7 prepared? 14:08:32

8 A. There were three separate drafts of notes, 14:08:36

9 so Melanie's notes, Hanley's notes, and my notes. 14:08:38

10 Melanie was actually tasked with taking notes during 14:08:43

11 the interview since Hanley and I were conducting the 14:08:45

12 interview, but we both still took notes as well. 14:08:48

13 And I believe Hanley might have done a first 14:08:50

14 draft of this memo with his notes reflected and 14:08:56

15 hopefully Melanie's integrated, and then I -- I 14:08:58

16 reviewed it and made sure -- tried to put in 14:09:01

17 obviously most of -- all the pertinent information 14:09:04

18 from the interview. 14:09:07

19 Q. Is it your belief that the interview 14:09:12

20 memorandum accurately reflects the substance of the 14:09:15

21 interview? 14:09:19

22 A. Yes. 14:09:19

23 Q. Is this Exhibit 7111 the type of document 14:09:26

24 that's maintained at Stroz Friedberg in the ordinary 14:09:30

25 course of business? 14:09:32

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